Approved:	JERRY J. FANG Assistant United States Attorney		
Before:	THE HONORABLE SARAH NETBUR United States Magistrate Judge Southern District of New York		23 MAG 2240
		X	23 MAG 2240
UNITED STATES OF AMERICA		: : : :	SEALED COMPLAINT Violations of 18 U.S.C. § 2113(a)
TEFON HALL,		:	COUNTIES OF OFFENSE:
	Defendant.	: : :	BRONX, WESTCHESTER
		X	

SOUTHERN DISTRICT OF NEW YORK, ss.:

THOMAS FORD, being duly sworn, deposes and says that he is a Special Agent with the Federal Bureau of Investigation ("FBI") and charges as follows:

COUNT ONE (Bank Robbery)

1. On or about January 6, 2023, in the Southern District of New York and elsewhere, TEFON HALL, the defendant, knowingly, by force and violence, and by intimidation, took and attempted to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were then insured by the Federal Deposit Insurance Corporation ("FDIC"), to wit, HALL obtained money from a bank in Mount Vernon, New York, by demanding that a bank employee turn over to HALL money in the bank's custody.

(Title 18, United States Code, Section 2113(a).)

(Bank Robbery)

2. On or about January 13, 2023, in the Southern District of New York and elsewhere, TEFON HALL, the defendant, knowingly, by force and violence, and by intimidation, took and attempted to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were then insured by the FDIC, to wit, HALL obtained money from a bank

in the Bronx, New York, by demanding that a bank employee turn over to HALL money in the bank's custody.

(Title 18, United States Code, Section 2113(a).)

(Bank Robbery)

3. On or about January 13, 2023, in the Southern District of New York and elsewhere, TEFON HALL, the defendant, knowingly, by force and violence, and by intimidation, took and attempted to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were then insured by the FDIC, to wit, HALL obtained money from a bank in the Bronx, New York, by demanding that a bank employee turn over to HALL money in the bank's custody.

(Title 18, United States Code, Section 2113(a).)

COUNT FOUR (Bank Robbery)

4. On or about March 10, 2023, in the Southern District of New York and elsewhere, TEFON HALL, the defendant, knowingly, by force and violence, and by intimidation, took and attempted to take, from the person and presence of another, property and money and other things of value belonging to, and in the care, custody, control, management, and possession of a bank, the deposits of which were then insured by the FDIC, to wit, HALL obtained money from a bank in Yonkers, New York, by demanding that a bank employee turn over to HALL money in the bank's custody.

(Title 18, United States Code, Section 2113(a).)

The bases for my knowledge and for the foregoing charges are, in part, as follows:

5. I am a Special Agent with the FBI. I have been personally involved in the investigation of this matter, and I base this affidavit on that experience, on my conversations with other law enforcement agents and other individuals, and my examination of various reports and records. Because this affidavit is being submitted for the limited purpose of demonstrating probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

The January 6, 2023 Bank Robbery

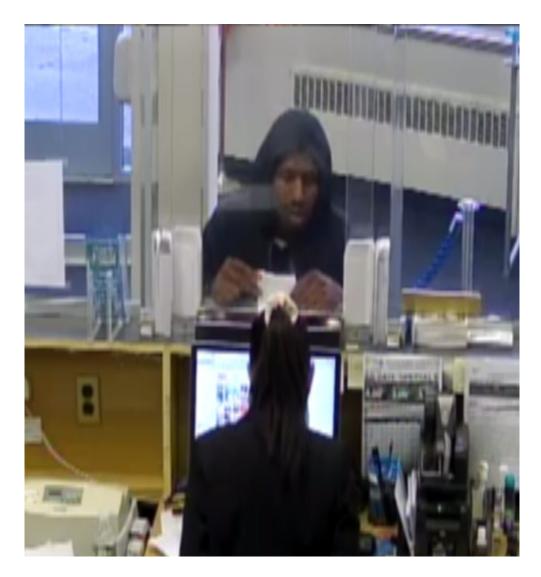
6. Based on my conversations with other law enforcement officers, my review of surveillance video footage, and my review of law enforcement reports and records, including

reports of interviews with victims and witnesses, I have learned the following, in substance and in part:

a. On or about January 6, 2023, at approximately 3:35 p.m., a man who has since been identified as TEFON HALL, the defendant, for the reasons detailed in paragraph 7, *infra*, entered a branch of a bank ("Bank-1") in the vicinity of East 1st Street and South 2nd Avenue in Mount Vernon, New York, wearing a black hooded sweater with a white and gray logo on the left side of the chest area and large white block lettering on the left sleeve. A still image of surveillance video footage taken from Bank-1, which shows the perpetrator of the January 6, 2023 bank robbery (the "January 6, 2023 Bank Robbery"), subsequently identified as HALL, is set forth below:



b. HALL then displayed to an employee of Bank-1 ("Employee-1") a handwritten note that demanded, in sum and substance, a stack of \$50 bills. HALL also orally demanded that the employee "hurry up" and give him the money. HALL did not leave the demand note. A still image of surveillance video footage taken from Bank-1, which shows HALL displaying the demand note to Employee-1, is set forth below:



c. After Employee-1 gave HALL \$1,750 of Bank-1's money in \$50 bills, HALL fled.

- 7. Based on my participation in this investigation, my review of surveillance video footage, my review of records and documents, and my discussions with other law enforcement officers, I have learned that TEFON HALL, the defendant, committed the January 6, 2023 Bank Robbery. Specifically, I have learned the following, in substance and in part:
- a. A Detective from the Mount Vernon Police Department ("Detective-1") who was familiar with HALL based on his participation in a previous robbery investigation involving HALL, reviewed surveillance video from Bank-1 depicting the January 6, 2023 Bank Robbery. Detective-1 suspected that HALL was the perpetrator of the January 6, 2023 Bank Robbery because the appearance of the perpetrator was consistent with HALL's appearance. The Mount Vernon Police Department also learned that HALL had an active social media account bearing the username "Tefon Hall," which posted a photograph from November 1, 2022 depicting HALL wearing a black hooded sweatshirt that matches the appearance of the sweatshirt worn by the individual who robbed Bank-1 on or about January 6, 2023. A screenshot of HALL's social media account that depicts this photograph is reproduced below:

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- b. Based on my review of surveillance video footage from the exterior of Bank-1, I have also learned that at approximately 3:29 p.m. on January 6, 2023, HALL was traveling in a silver or gray sedan (the "Vehicle") westbound on East 1st Street, conducted a Uturn, and parked in front of 38 East 1st Street facing eastbound. HALL then exited the Vehicle, crossed South 2nd Avenue, and entered Bank-1. Following the robbery, HALL drove away in the Vehicle, turning right on South 2nd Avenue before proceeding southbound. Based on my review of vehicle registration databases, I know that a 2011 gray Chevrolet Cruze sedan with New York license plate KYU-1455 is registered to HALL, and, as detailed in paragraph 10(a), *infra*, that HALL uses the Vehicle.
- c. Based on my discussions with other law enforcement officers, I have also learned that (i) HALL had previously been supervised by a probation officer from in or about

August 2021 through in or about December 2022 ("Probation Officer-1"); (ii) Probation Officer-1 met with HALL 3-4 times each week for the first six months, and 1-2 times each week thereafter; and (iii) Probation Officer-1 identified HALL as the robber of Bank-1 after reviewing surveillance video footage from Bank-1, which showed the robber's face, body structure, and gait.

The January 13, 2023 Bank Robberies

- Based on my conversations with other law enforcement officers, my review of surveillance video footage, and my review of law enforcement reports and records, including reports of interviews with victims and witnesses, I have learned the following, in substance and in part:
- On or about January 13, 2023, at approximately 9:46 a.m., a man who has since been identified as TEFON HALL, the defendant, for the reasons detailed at paragraphs 10 and 13, infra, entered a branch of a bank ("Bank-2") in the vicinity of East Tremont Avenue and St. Raymond Avenue in the Bronx, New York, wearing a black North Face jacket, light-colored distressed jeans, and dark Crocs footwear. Still images of surveillance video footage taken from Bank-2, which show the perpetrator of this bank robbery (the "First January 13, 2023 Bank Robbery") entering Bank-2 and approaching a teller window, are set forth below:





HALL then displayed to an employee of Bank-2 ("Employee-2") a handwritten note that demanded, in substance and in part, \$100 bills. Employee-2 understood this was a robbery. HALL also orally demanded that Employee-2 give him "all the hundreds from the top drawer." Employee-2 asked HALL to insert his bank card to stall him, but HALL repeated in

a loud voice his demand that Employee-2 give him "all the hundreds from the top drawer." Employee-2, fearing for his safety and those of his co-workers, pushed the silent alarm and gave HALL \$500 of Bank-2's money in \$100 bills. Subsequently, HALL fled. HALL did not leave the demand note. A still image of surveillance video footage taken from Bank-2, which shows HALL exiting the bank branch, is set forth below:



- 9. Based on my conversations with other law enforcement officers, my review of surveillance video footage, and my review of law enforcement reports and records, including reports of interviews with victims and witnesses, I have learned the following, in substance and in part:
- a. Less than eight hours after the First January 13, 2023 Bank Robbery, on or about January 13, 2023, at approximately 5:05 p.m., a man who has since been identified as TEFON HALL, the defendant, for the reasons detailed at paragraphs 10 and 13, *infra*, entered another branch of Bank-2 in the vicinity of West 231st Street and Broadway in the Bronx, New York, wearing a black skullcap, a black puffy exterior jacket, a light blue hooded sweatshirt

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underneath the black puffy exterior jacket, dark pants, and dark Crocs footwear. A still image of surveillance video footage taken from Bank-2, which shows the perpetrator of this bank robbery (the "Second January 13, 2023 Bank Robbery"), is set forth below:



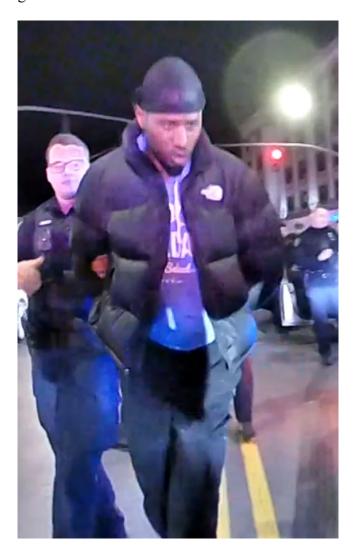
b. HALL displayed a note to an employee of the Bank-2 branch ("Employee-3") and immediately demanded \$100 bills from her cash box. Employee-3 gave HALL \$100 in \$5 bills, causing HALL to again demand \$100 bills. After Employee-3 informed HALL that she would need to go and retrieve the \$100 bills, HALL repeated his demand for \$100 bills. Employee-3 asked her co-worker ("Employee-4") in Spanish not to leave. Employee-3 also attempted to activate the silent alarm, but failed to do so. Employee-4 realized that Bank-2 was being robbed and alerted their manager ("Manager-1"). At Manager-1's direction, Employee-3 walked away

from her teller station, and HALL fled. HALL did not leave the demand note. A still image of surveillance video footage taken from Bank-2, which shows HALL at the teller window, is set forth below:



10. Based on my participation in this investigation, my review of surveillance video footage and bodyworn camera footage, my review of records and documents, and my discussions with other law enforcement officers, I have learned that TEFON HALL, the defendant, committed the First January 13, 2023 Bank Robbery and the Second January 13, 2023 Bank Robbery. Specifically, I have learned the following, in substance and in part:

a. On January 13, 2023, two Police Officers of the Yonkers Police Department ("Officer-1" and "Officer-2") who were on patrol received a license plate reader notification over the radio for the Vehicle, which was wanted in connection with the January 6, 2023 Bank Robbery. In canvassing the vicinity of South Broadway and Randolph Street in Yonkers, New York, Officer-1 observed the Vehicle. After backup units arrived, Officer-1 and Officer-2 stopped the vehicle, identified the driver as HALL, and arrested him. The following are still images taken from bodyworn camera footage of HALL's arrest:



Following HALL's arrest by the Yonkers Police Department, he was charged by the Westchester County District Attorney's Office in connection with the January 6, 2023 Bank Robbery. On or about February 22, 2023, HALL was released on bail.

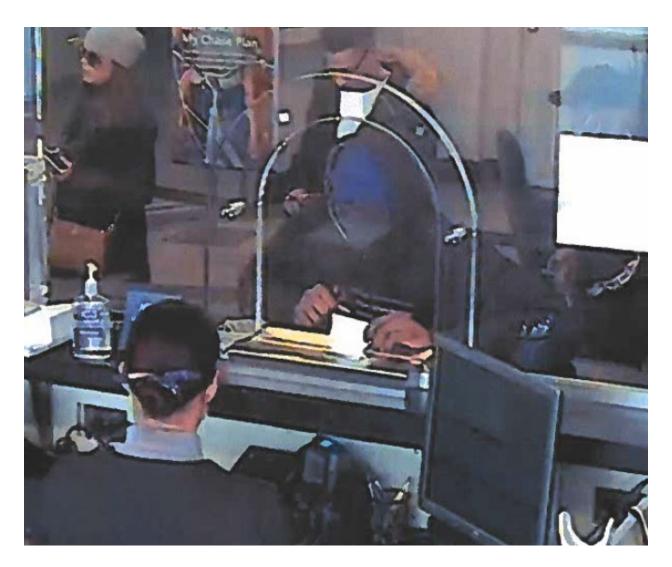


b. Based on my review of bodyworn camera footage of HALL's arrest, I have learned that (i) HALL appears to be wearing the same skullcap he wore during the Second January 13, 2023 Bank Robbery; (ii) HALL appears to be wearing the same black North Face jacket he wore during the First January 13, 2023 Bank Robbery; (iii) HALL appears to be wearing the same light blue hooded sweatshirt he wore during the Second January 13, 2023 Bank Robbery; and (iv) HALL appears to be wearing the same dark Crocs footwear he wore during the First January 13, 2023 Bank Robbery and the Second January 13, 2023 Bank Robbery.

The March 10, 2023 Bank Robbery

- 11. Based on my conversations with other law enforcement officers, my review of surveillance video footage, and my review of law enforcement reports and records, including reports of individuals with victims and witnesses, I have learned the following, in substance and in part:
- a. On or about March 10, 2023, at approximately 12:15 p.m., a man who has since been identified as TEFON HALL, the defendant, for the reasons detailed at paragraphs 12 and 13, *infra*, entered a third branch of Bank-2 in the vicinity of Post Street and South Broadway in Yonkers, New York, wearing a black hooded jacket with an American flag design on the chest, gray sweatpants, dark Crocs footwear, and a blue beanie. A still image of surveillance video footage from Bank-2, which shows the perpetrator of the March 10, 2023 bank robbery (the "March 10, 2023 Bank Robbery"), subsequently identified as HALL, is set forth below:

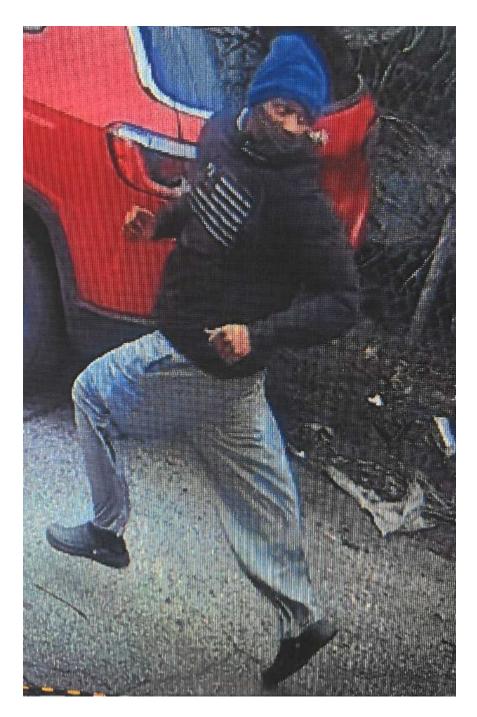
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b. HALL approached a teller window and pressed a note against the glass that demanded, in sum and substance, that the employee of Bank-2 ("Employee-5") give him \$5,000 in cash. Employee-5, who initially believed that HALL wanted to make a withdrawal, asked HALL for identification. After HALL reiterated his demand that Employee-5 give him money from her cash drawer, Employee-5 realized that she was being robbed and told her co-worker in Spanish that she was being robbed and that she was nervous. Noticing this interaction, HALL repeatedly ordered Employee-5 to give him the money and told her, in substance, not to make him do something that he did not want to do. Interpreting this statement to be a threat, Employee-5 gave HALL \$500 of Bank-2's money, after which HALL fled. HALL did not leave the demand note. A still image of surveillance video footage from Bank-2, which shows HALL in the lobby of Bank-2 on March 10, 2023, is set forth below:

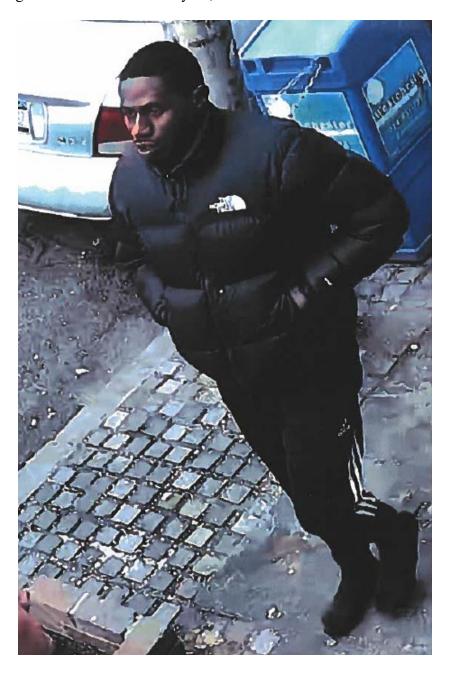


- 12. Based on my participation in this investigation, my review of surveillance video footage, my review of records and documents, including reports of interviews with victims and witnesses, and my discussions with other law enforcement officers, I have learned that TEFON HALL, the defendant, committed the March 10, 2023 Bank Robbery. Specifically, I have learned the following, in substance and in part:
- a. Immediately following the robbery, a witness ("Witness-1") followed HALL out of the bank through the parking lot. Witness-1 informed members of the Yonkers Police Department in an interview that the robber realized he was being followed and began fleeing on foot to the vicinity of McLean Avenue and Western Avenue before jumping over a fence on Western Avenue. The following is a still image of surveillance video footage collected from a subsequent video canvass that depicts HALL fleeing from the bank, which shows him clad in a black hooded jacket with an American flag design on the chest, gray sweatpants, dark Crocs footwear, and a blue beanie:



b. Following further review of surveillance video footage recovered from the video canvass, members of the Yonkers Police Department observed HALL, wearing a black puffy jacket and gray pants walking to the rear of a single-family home located on Randolph Street (the "Randolph House"). Law enforcement officers then observed HALL walking from the rear of the Randolph House, wearing the same black puffy jacket, dark navy sweatpants with white stripes, and black socks without shoes. Following a physical canvass of the Randolph House, law enforcement officers observed a pair of dark Crocs footwear, gray pants, and a black mask at the rear of the Randolph House, consistent with the articles of clothing worn by HALL during the March 10, 2023 Bank Robbery.

c. Based on review of surveillance video footage, law enforcement officers subsequently observed HALL moving westbound on Randolph Street and southbound on South Broadway. The following is a still image of surveillance video footage obtained following a video canvass, depicting HALL walking on South Broadway, wearing a black North Face jacket that appears to be the same worn by HALL during the First January 13, 2023 Bank Robbery, and by HALL on the night of his arrest on January 13, 2023:



d. After reviewing the still image depicted above, a Detective of the Yonkers Police Department identified the subject as HALL based on prior police interactions with HALL.

- 13. Based on my participation in a custodial interview of TEFON HALL, the defendant, on March 15, 2023, along with a Detective of the Yonkers Police Department ("Detective-2"), I know, in substance and in part, the following:
- a. HALL was arrested on March 15, 2023 on probable cause by another Detective of the Yonkers Police Department ("Detective-3"), in connection with his participation in the March 10, 2023 Bank Robbery.
- b. HALL was advised of <u>Miranda</u> rights, waived those rights, and agreed to speak with law enforcement.
- c. HALL was shown photographs of the perpetrator of the First January 13, 2023 Bank Robbery. After reviewing those photographs, he admitted that he was the individual who committed the First January 13, 2023 Bank Robbery.
- d. HALL was shown photographs of the perpetrator of the Second January 13, 2023 Bank Robbery. After reviewing those photographs, he admitted that he was the individual who committed the Second January 13, 2023 Bank Robbery.
- e. HALL was shown photographs of the perpetrator of the March 10, 2023 Bank Robbery before, during, and after the robbery. After reviewing these photographs, he admitted that he was the individual who committed the March 10, 2023 Bank Robbery.

Federal Deposit Insurance Corporation

14. From my review of publicly available materials, as well as my training and experience as a Special Agent of the FBI, I know that, at all relevant times, the deposits of Bank-1 and Bank-2 were insured by the FDIC.

WHEREFORE, I respectfully request that a warrant be issued for the arrest of TEFON HALL, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.

/s authorized electronic signature

THOMAS FORD
Special Agent
Federal Bureau of Investigation

Sworn to me through the transmission of this Complaint by reliable electronic means (telephone), this 20thday of March, 2023.

THE HONORABLE SARAH NETBURN

United States Magistrate Judge Southern District of New York